



COEUR D'ALENE TRIBE

INFORMATION TECHNOLOGY DEPARTMENT

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March 6, 2014

via ECFS

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Expression of Interest, Rural Broadband Experiment, WC Docket 10-90

Dear Ms. Dortch,

I am writing to submit a letter of interest to participate in the FCC's Rural Broadband Experiment, WC Docket 10-90, for census tracts located on the Coeur d'Alene Indian Reservation.

The Coeur d'Alene Tribe is a federally recognized tribe. The Tribe has been in this homeland for many thousands of years with an aboriginal territory that covered more than 5 million acres across three states. Today the Tribe has sovereign authority on a reservation located in rural North Idaho in both Benewah and Kootenai counties. The reservation covers 345,000 acres of mountains, lakes, timber and farmland spanning the western edge of the northern Rocky Mountains and Palouse country.

The Tribe owns and operates Red-Spectrum Communications. Red-Spectrum has been in operations since 2005 as an unsubsidized broadband internet services provider.

Our existing service area covers two census tracts:

Kootenai	16055940000
Benewah	16009940000

We provide services to all residents on the reservation in the communities of Plummer, Worley, Tensed, and DeSmet, as well as isolated farms and rural home sites that have direct line of site to one of our six wireless communications towers and/or access points.

Approximately 10% of the households in our service area live within the distance limitation range from the local exchange carrier's central and can access DSL through the LEC if they choose. The remaining 90% either receive services from us or remain unserved.

Red-Spectrum has provided wireless broadband since 2005. In 2009 we began plans to deploy a fiber to the home Gigabit Passive Optical Network (GPON) to offer improved services to more homes on the reservation. This plan was made possible through the Broadband Initiatives Program (BIP) under the USDA Rural Utilities Service in which we received a 50/50 grant / loan to build out a fiber-to-the-home network.

Our build out includes 275 route miles of fiber for our distribution network, plus 88 miles for our backbone and middle mile network. The backbone and middle mile connects the distribution network to a carrier-

hotel off the reservation, and also ties the reservation communities together. Construction of the back bone and middle mile began last year and is scheduled to be complete this spring.

Our FTTH distribution network includes the communities of Plummer, Worley, Tensed, and DeSmet, with some lateral runs to several outlying areas and population centers along the Coeur d'Alene Lake. (attached map, BIP buried and aerial distribution). We are on track to begin construction this summer.

By deploying a FTTH network, we will immediately be able to offer advanced services to our customers that will include voice, video and data. Our anticipated speeds will range from 5 Mbps to 100 Mbps for customers on fiber. These goals place us in alignment with the FCC's National Broadband Plan.

By moving most of our wireless customers to a fiber network, the noise interference will decrease thus allowing higher bandwidth delivery for the remaining wireless customers. Our service offerings for wireless customers will range from 3 Mbps and up. Our business offerings will include dedicated point-to-point services with speeds ranging from 300 Mbps to 1 Gbps through our fiber optic network.

Our prices range from \$24.95 to \$99.95 for residential. Our business offerings are typically unique special builds and are negotiated on a case by case basis.

Our original FTTH plans have been 100% designed and engineered. Unfortunately, due to budget constraints, we removed over 20 routes and sub-routes from our construction plans. Several of these routes are in valleys and canyons and do not have direct line of site to any of our towers / access points. Additionally, they are miles beyond the DSL distance range from the local exchange's central office in Plummer, Idaho.

This proposal is to provide services to households along those routes that are in eligible locations in the Benewah and/or Kootenai County census tracts. We would like to extend our fiber network to include those locations that are already designed and engineered (attached map, Proposed Rural routes).

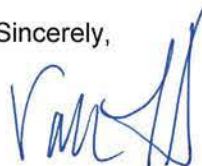
In addition, we would like to build additional towers and/or access points to reach the remaining customers. These locations are predominantly residential households along gravel roads in mountain valleys. There are no community anchor institutions in these remote areas.

We are requesting one-time costs of \$1,526,293.05 to build out fiber along the 20 routes and sub-routes. These estimates are based on our last two construction bidding rounds. The costs include all labor and material, except fiber and conduit. The Tribe has sufficient fiber and conduit on hand to cover those routes.

The costs for towers and/or access points are based will vary depending on location, proximity to power, road access, and other factors. We will need time to conduct field assessments and site visits to various locations once the mountain tops are clear. We will also need time to determine whether the costs to reach these remote locations would require one-time or recurring costs to provide them services.

We appreciate the opportunity to participate in the FCC's Rural Broadband Experiments and welcome any questions you may have. Please feel free to contact me at 208-686-5059.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Valerie Fast Horse', with a stylized flourish at the end.

Valerie Fast Horse
Director, IT

Attachment:
FCC Rural Broadband Experiments Map